

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

AAS/DKK/SME/MAA/LB/CJN F. #2017R05903

271 Cadman Plaza East Brooklyn, New York 11201

December 8, 2021

## By Email and ECF

Thomas C. Green Mark D. Hopson Michael A. Levy Brian J. Stretch Douglas A. Axel Melissa Colon-Bosolet Sidley Austin LLP

David Bitkower Matthew S. Hellman Matthew D. Cipolla Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.

Criminal Docket No. 18-457 (S-3) (AMD)

## Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. <u>See</u> ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

## I. The Government's Discovery

| Document Description          | Category of Discovery Pursuant to Protective Order | Bates Range  |
|-------------------------------|--|--|
| Financial institution records | Sensitive Discovery<br>Material ("SDM")            | DOJ_HUAWEI_A_0111351467 –<br>DOJ_HUAWEI_A_0111351469 |
| Staffing company records      | SDM  | DOJ_HUAWEI_A_0111351470                              |

| <b>Document Description</b> | Category of Discovery Pursuant to Protective Order | Bates Range  |
|-----------------------------|--|--|
| Staffing company records    | Discovery Material                                 | DOJ_HUAWEI_A_0111351471 –<br>DOJ_HUAWEI_A_0111351481 |

Very truly yours,

NICOLE BOECKMANN Acting United States Attorney Acting Under Authority Conferred by 28

U.S.C. § 515

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cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)